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CLERK, U.S. DISTRICT COURT  
NORTHERN DISTRICT OF OHIO  
CLEVELAND

May 18, 2019

MOTION TO INTERVENE AS INTERESTED PARTY: CASE NO. 1:19-cv-145  
DIGITAL MEDIA SOLUTIONS, LLC (Plaintiff) vs. SOUTH UNIVERSITY OF OHIO, LLC, et al.  
(Defendants)

United States District Court  
Northern District of Ohio  
Eastern Division  
Judge Dan Aaron Polster  
Magistrate Judge Thomas M. Parker

Dear Judge Polster,

I am a former full time faculty member of the Art Institute of Pittsburgh Online Division, and one who has still not received a paycheck for the pay period of Feb. 22 -March 8, 2019, which was due to be paid on March 15 by DCEH. I have no legal expertise, and considering my unemployed status, I am unable to afford legal representation, but the clerk at your court suggested that I submit this letter to represent myself in the court proceedings as a party needing redress. I realize that the Receiver claims to be making every effort to find funding for our final pay, however, with the end of the Receivership in sight, this outcome is seeming less and less likely. In addition, when contacting the Receiver's office I have been given conflicting information on the status of our pay, first being told they were waiting on you to sign a motion to pay us, and then being told no such motion exists. The lack of information provided to employees, the conflicting information, and the lack of appropriate notice has created a significant hardship.

My main aim with this request is to:

1. Receive the final pay mentioned above.
2. Have all health insurance payroll deductions from December 2018-March 2019 reimbursed in full. These deductions were taken from my paycheck under the assurance that health insurance was being provided, and this was not the case.
3. I am concerned about the security of my personal information housed on DCEH servers and how that information will be protected. I would like to see a plan to address this for former employees.
4. I would like copies of my transcripts from Argosy University (official and unofficial) that I attended while employed at EDMC/DCEH, this request has been made and no response provided or transcripts sent. In addition, I would like to know how future transcript requests be handled, many schools require potential employees to provide official

transcripts when seeking employment in higher education, and there currently is no plan in place for this information to be accessed.

5. Additionally, to aid employees in their own record keeping and ability to defend themselves, or act legally, I would like to request that former employees be given temporary access to, or copies of:
  - a. Their paystubs for a year of employment.
  - b. Documentation of DCEH Health Plans for a year of employment.
  - c. Documentation of the DCEH Standards, Policies and Procedures library for the year prior to closure of the company.
  - d. Copies of contracts from the previous year
  - e. Statements indicating the total cost paid for health insurance beginning in December 2018 (when claims stopped being processed)
  - f. Statements of all 401K deposits from January 2018-March 2019 made by into my Fidelity account from my paycheck, as well as any matched amount by DCEH as well as the dates to correspond.

Thank you for your consideration of these requests.

Sincerely,

Dr. Rebecca Kelley